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21 *Attorneys for Defendants*

22 UBER TECHNOLOGIES, INC., RASIER, LLC,

23 And RASIER-CA, LLC

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN FRANCISCO DIVISION**

18 IN RE: UBER TECHNOLOGIES, INC.,
19 PASSENGER SEXUAL ASSAULT
20 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

21 This Document Relates to:
22 **ALL ACTIONS**

NOTICE REGARDING DEPOSITION OF
VARUN KAUSHAL

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 Defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC (collectively “Uber”), and
 2 Plaintiffs’ Co-Lead Counsel (collectively referred to herein as “the Parties”) respectfully submit this brief
 3 response to Plaintiffs’ Notice Regarding the Deposition of Varun Kaushal. Despite briefing the necessity
 4 of this deposition to the Court twice (Dkts 3344 and 3412), Plaintiffs today informed the Court they no
 5 longer need the deposition.

6 Uber respectfully requests that the Court hold a hearing on this matter for two reasons. First,
 7 Plaintiffs’ Notice omits that while they are forgoing Kaushal, they are “instead” noticing a replacement
 8 witness (as well as several additional witnesses). Second, since the parties filed their most recent Joint
 9 Submission to the Court, on July 2, 2025, Plaintiffs deposed their first Uber “case-specific” witness. That
 10 deposition lasted for five hours and fourteen minutes, with Plaintiffs’ counsel questioning the witness for
 11 roughly three-and-a-half hours (across 164 pages of transcript) about general topics before asking any
 12 case-specific question.

13 In light of the foregoing, Uber respectfully submits that the issue of the appropriate scope of case
 14 specific depositions remains unsettled and requests that the Court set a further hearing.

15 DATED: July 7, 2025

16 Respectfully submitted,

17 /s/ Laura Vartain Horn

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